

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

FLAVAWORKS ENTERTAINMENT, INC.,  
BLATINO MEDIA, INC.,

Plaintiffs,

vs.

JOHN DOES, et al., including  
CHRISTOPHER LARINO and  
MICHAEL SHANE GORDON, et al.,

**CASE NO.: 1-24-cv-09725**  
Honorable Franklin U. Valderrama  
Magistrate: Honorable Appenteng

Defendants.

---

**DEFENDANT GORDON's MOTION FOR TWENTY-MINUTE ORAL ARGUMENT IN  
SUPPORT OF HIS MOTION FOR AN INTERDISTRICT TRANSFER.**

Now comes the Defendant, Mr. Michael Shane Gordon, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 78 and the Northern District of Illinois Local Rule 78.3, respectfully moves this Court to grant a twenty-minute oral argument on the Defendant's pending Motion for Interdistrict Transfer. Nothing in Plaintiffs' Surr-Response or its attached exhibit rebuts the Defendant's affidavit that personal jurisdiction does not exist either by "non-consensual" grounds or by "consent" vis-à-vis contract in the Northern District of Illinois.

**WHEREFORE**, the Defendant respectfully requests that this Court set a date for oral argument at the Court's earliest convenience, transfer to the Northern District of Georgia, dismissal, or for relief the court deems just.

Dated: October 24, 2025.

*(s) Michael P. Simkus*  
**FS CORPS, Professional Corporation**  
MICHAEL P. SIMKUS, ESQ.  
4320 WINFIELD ROAD SUITE 200  
WARRENVILLE, ILLINOIS 60555